

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Adam L Jankos	:	
	:	
Debtors	:	Chapter 13
	:	
Adam L Jankos	:	Bankruptcy No. 19-10237 ELF
	:	
Movant	:	
	:	
v.	:	
	:	
JPMorgan Chase Bank, National Association	:	
Respondent	:	

**RESPONSE OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO
EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND
CLEAR OF LIENS AND ENCUMBRANCES**

Respondent, JPMorgan Chase Bank, National Association, by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to Expedited Motion For Authority To Sell Real Property Free and Clear of Liens and Encumbrances and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
5. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
6. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
7. Admitted. The Agreement of Sale is attached.
8. Admitted.

9. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.

10. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment. The total debt stated in Proof of Claim number 11 is \$195,597.65. Regardless, Respondent must be paid in full subject to a proper payoff quote at the time of closing.

11. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.

12. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.

13. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.

WHEREFORE, Respondent, JPMorgan Chase Bank, National Association respectfully requests that this Honorable Court deny Expedited Motion For Authority To Sell Real Property Free and Clear of Liens and Encumbrances in its entirety without the following provision:

- 1) Debtor shall include in the Order that either JPMorgan Chase Bank, N.A. will be paid in full subject to a proper payoff quote at the time of closing or that any sale short of full payoff will be subject to JPMorgan Chase Bank, N.A.'s final approval;
- 2) Closing is required within 30 days of the payoff quote date or a new payoff is required within 30 days of closing; and
- 3) Closing is required within 120 days of this motion's court ordered approval.

Respectfully submitted,

Date: June 14, 2019

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